

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. \_\_\_\_\_

**RECEIVED**

AUG 21 2020

CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARC BELL GONZALES,

Defendants.

**INFORMATION**

18 U.S.C. § 844(i)

18 U.S.C. § 371

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT 1**

(Arson)

1. On or about May 28, 2020, in the State and District of Minnesota, the defendant,

**MARC BELL GONZALES,**

knowingly and willfully conspired and agreed with A.H. to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, 844(i), all in violation of Title 18, United States Code, Section 371.

**PURPOSE OF THE CONSPIRACY**

2. The purpose of the conspiracy was to commit an act of arson at the Wells Fargo Bank building located at 3030 Nicollet Ave. South, in the City of Minneapolis, in the District of Minnesota.

**MANNER AND MEANS**

3. It was part of the conspiracy that on May 28, 2020, defendant Marc Bell Gonzales joined other individuals who had gathered at 3030 Nicollet Ave. South, City



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of Minneapolis, in the District of Minnesota and thereafter engaged in conduct designed to accelerate a fire in the Wells Fargo Bank building at 3030 Nicollet Ave. South, in the City of Minneapolis, in the District of Minnesota.

**OVERT ACT**

4. In furtherance of the conspiracy and to achieve its objects, the defendant committed, directly and through coconspirators, certain overt acts, including but not limited to the following:

5. On or about May 28, 2020, the defendant poured gasoline onto the property of the Wells Fargo Bank building located at 3030 Nicollet Ave. South in the City of Minneapolis and District of Minnesota for the purpose of accelerating the fire at that location.

All in violation of Title 18, United States Code, Section 371.

Date: August 21, 2020

ERICA H. MACDONALD  
United States Attorney

/s/Andrew R. Winter  
ANDREW R. WINTER  
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